

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE MILLENNIUM INSTITUTE FOR ANC, INC.

Debtor

Case No.: 12-02689 BKT

Chapter 11

MOTION SUBMITTING DOCUMENTS:
EXHIBITS TO FIRST AMENDED POST CONFIRMATION MODIFICATION
OF CHAPTER 11 PLAN

TO THE HONORABLE COURT:

COMES NOW, the debtor, **THE MILLENNIUM INSTITUTE FOR ANC, INC.** (“Debtor” or “Reorganized Debtor” hereinafter), represented by the undersigned counselors, and very respectfully states, prays and requests:

1. On March 30, 2016, the appearing Debtor filed a motion submitting a First Amended Post Confirmation Modification of the Confirmed Plan of Reorganization, and request for its approval. [[Docket No. 344](#)].

2. Such motion makes reference to certain exhibits that were supposed to be filed attached to the modification request; nevertheless, due to an error of inadvertence, such exhibits were not filed. Thus, the Debtor hereby submits the exhibits that are to be considered jointly with [Docket No. 344](#). With respect to Exhibit C, the same is subject to amendment once the stipulation between the Debtor and PR Asset Portfolio 2013-1 International, LLC (“PRAPI”) is filed.

WHEREFORE the Debtors respectfully move this Honorable Court to entertain the present motion, and that the documents submitted herein be considered jointly with Docket No 344.

NOTICE

Within twenty one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

WE HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, which will send notification to all parties who have requested electronic notification, and that it was sent by U.S. First Class Mail to all creditors jointly with a copy Docket No. 344.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 31st day of March 2016.

GARCÍA-ARREGUI & FULLANA PSC
252 Ponce de León Ave. Suite 1101
Citibank Towers
San Juan, Puerto Rico 00918
Telephone: (787) 766-2530
Facsimile: (787) 756-7800
E-mail: ifullana@garciaarreguifullanalaw.com
ecapdevila@garciaarreguifullanalaw.com

/s/Isabel M. Fullana
Isabel M. Fullana
USDCPR No. 126802

/s/Eduardo J. Capdevila
Eduardo J. Capdevila
USDCPR No. 302713

Attorneys for the Debtor